



University of Hawai'i at Mānoa

Environmental Center

A Unit of Water Resources Research Center

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July 5, 1995

RP: 0172

Ms. Rae M. Loui, Deputy Director
Department of Land and Natural Resources
Commission on Water Resource Management
P.O. Box 621
Honolulu, Hawaii 96809

Dear Ms. Loui:

Stream Channel Alteration Permit Kapunahala Stream Kaneohe, Oahu

The applicant, Hope Chapel Kaneohe, proposes to construct a driveway through an existing wetland area fed by Kapunahala Stream in Kaneohe, Oahu. The driveway pavement width will be 24 feet and the length through the wetland is approximately 400 feet. The project also includes construction of precast concrete walls along the driveway boundary and installation of streetlights and underground electrical wires.

Our review was conducted with the assistance of Dave Penn, Geography; and Tom Hawley, Environmental Center.

This project offers a good example of gradual urban encroachment upon a wetland, resulting in large cumulative impacts from several incremental activities of "negligible" impact. Previous actions in this area, including stream channel alteration violations downstream from the proposed driveway site and drainage "improvements" and easements further downstream, have already significantly altered the streamflow characteristics of Kapunahala Stream.

In addition to these concerns, some of the information in the permit application appears debatable, and there are details which require further explanation.

- 1b. Further information on the LANDOWNER in this area needs to be included in the permit application. Simply writing "State of Hawai'i"

without also including the required contact name, phone number and address is insufficient.

3. Though the stream is classified as "intermittent" on the application, our reviewers have pointed out that it also could be classified "perennial", as it has high-level spring sources and perennial wetland components. One of the spring sources was tapped by the well servicing the State Hospital. Storage and discharge characteristics of the wetland and downstream reaches have changed over time in response to encroachment and disruption, most recently the filling of 0.7 acres at the wetland toe and associated drainage structures.
6. The environmental assessment for this project suggests that it will reduce discharges to Kapunahala Stream. This change in flow regime may be prohibited under current instream flow standards and could be considered a diversion of Kapunahala flows. Given this possibility, the "N/A" designation on part 6 of the application is also inadequate.

The information presented beginning on page 1 under the heading "Department of Land and Natural Resources Commission on Water Resource Management" is confusing, as it is not on Commission letterhead. Our reviewers questioned whether this is a standard Commission information reporting format. We also questioned why many of the blanks have not been filled in on this portion of the application.

Our reviewers also were concerned that attachments B, C, and F were not included in the informational packet we received. These and other related permits for which no documentation is attached (such as the county grading permit) are key documents for assessing construction related impacts, as they would include erosion control plans detailing best management practices to be implemented.

Attachment D, CDUA application, lacks appropriate government agency signatures. While the letter from DLNR dated December 6, 1994 finds that no public hearing will be required for CDUA decisionmaking, nearby landowners have questioned the alienation of ceded lands for the proposed project (see Stender in the Final EA) and would benefit from a public forum for expressing these concerns.

Any further alteration of Kapunahala hydrology is of great concern to downstream landowners whose property was destroyed by previous DOT wetland fills. At least one of these, (see Stender in Final EA) has requested that no permits be issued for Kapunahala stream alterations until DOT completes the stream channel rehabilitation work previously imposed by the Water Commission.

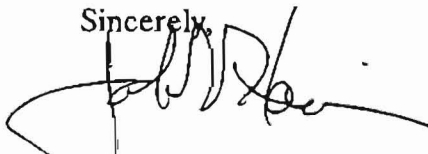
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The Water Commission is able to set Hawaii Water Plan guidelines regarding permitted and unpermitted uses of water resources in specific areas. For wetlands such as Kapunahala which face repeated incremental encroachment, it appears that some limits on these encroachments should be established. Otherwise, encroachers will continue to justify the "negligibility" of each increment while ignoring historic and cumulative landscape change and its long-term implications. As can be seen from previous comments to the project planner, even pursuit of "no net loss" compliance does not guarantee a quantitative balance.

Finally, we note that access through the Castle Hills residential subdivision offers an alternative which, although presently denied by the City, nevertheless eliminates further impacts to this wetland area. We recommend that an appeal be filed with the City, citing information developed in our review, and exploring this option further. The savings of both monetary and environmental costs are considerable, and while traffic impacts in the subdivision are likely, it also is likely that specific mitigating measures may alleviate many of those impacts.

Thank you for the opportunity to comment on this document.

Sincerely,

A handwritten signature in black ink, appearing to read 'John T. Harrison', with a large, sweeping flourish extending to the left.

John T. Harrison
Environmental Coordinator

cc: OEQC
Hope Chapel
Roger Fujioka
Dave Penn
Tom Hawley